

# **EXHIBIT 2**



LAW FIRM OF  
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ADMITTED: NEW YORK, EIGHTH CIRCUIT  
SECOND CIRCUIT  
US COURT ON INTERNATIONAL TRADE

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**VIA ELECTRONIC MAIL ONLY**

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Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MD 1570 (GBD) (SN)

Counsel:

This letter follows our conference call of yesterday. During that conference you ambushed us with some serious allegations of improper conduct related to WAMY's expert, Jonathan Marks. We asked you to provide us the source of these claims. All you could tell us was that the source was anonymous. You indicated you received the allegations in writing, but refused to provide us with a copy of the writing. Because you did not produce this document to us in advance of our meeting nor identify the issues or the source, we did not have any opportunity to prepare for the meeting. Thus, by no means have we been able to meet and confer about issues we knew nothing about before the call.

We are not in a position to respond to defamatory allegations from an anonymous source beyond saying that absolutely nothing improper occurred with respect to WAMY expert witness Jonathan Marks. The allegations of improper witness coaching, false billing entries, and "buried" evidence are absolutely false. We will be able to fully respond to the false allegations once we know what exactly they are and who is making them.

All we have now is your second-hand description of, as far as has been presented to us, unknown claims from an unknown source. Please provide us in writing, and preferably under oath, with the identity of the person making the allegations, the details of their claims, and their basis

for making them. We believe that basic fairness, to say nothing of professional decorum, requires that you exercise such due diligence before proceeding any further with this matter.

Be advised that we fully intend to seek appropriate relief against whoever made these allegations against us as well as any other actions that may become appropriate if a frivolous application is made. Additionally, Mr. Marks and other persons and entities may also seek relief for any damage to them as a result of these defamatory statements, though of course we cannot and do not speak for them.

Please be guided accordingly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Omar Mohammedi', with a stylized flourish at the end.

Omar Mohammedi

*s/s Frederick Goetz*

Frederick Goetz